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FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

OCT - 9 2024

SEAN F. MCAVOY, CLERK
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YAKIMA, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALLICIANNA LYNNZIE CLARK,

Defendant.

1:24-CR-2073-MKD

INDICTMENT

Vio: 21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii)
Possession with the Intent to
Distribute 50 Grams of Pure
Methamphetamine
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(C)
Possession with the Intent to
Distribute Fentanyl
(Count 2)

18 U.S.C. § 924(c)(1)(A)
Possession of a Firearm in
Furtherance of Drug
Trafficking
(Count 3)

18 U.S.C. §§ 922(g), 924(a)(8)
Felon in Possession of a
Firearm
(Count 4)

21 U.S.C. § 853, 18 U.S.C.
§ 924, 28 U.S.C. § 2461(c)
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

On or about August 5, 2024, in the Eastern District of Washington, the Defendant, ALLICIANNA LYNNZIE CLARK, knowingly possessed with intent to distribute 50 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

COUNT 2

On or about August 5, 2024, in the Eastern District of Washington, the Defendant, ALLICIANNA LYNNZIE CLARK, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 3

On or about August 5, 2024, in the Eastern District of Washington, the Defendant, ALLICIANNA LYNNZIE CLARK, did knowingly possess a firearm, that is: a Glock Model 19, 9mm pistol bearing serial number BEYY793, in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, to wit: Possession with Intent to Distribute 50 Grams or more of Actual (Pure) Methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii), as charged in Count 1, and Possession with Intent to Distribute Fentanyl, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C), as charged in Count 2, all in violation of 18 U.S.C. § 924(c)(1)(A).

COUNT 4

On or about August 5, 2024, in the Eastern District of Washington, the Defendant, ALLICIANNA LYNNZIE CLARK, knowing her status as a person previously convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce, a firearm, to wit: a Glock Model 19, 9mm pistol bearing serial number BEYY793, which firearm had theretofore been transported in interstate and foreign commerce, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(8).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense(s) in violation of 21 U.S.C. § 841, as set forth in Counts 1-2 of this Indictment, Defendant, ALLICIANNA LYNNZIE CLARK, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s) and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense(s). The property to be forfeited includes, but is not limited to:

a Glock Model 19, 9mm pistol bearing serial number BEYY793.

If any forfeitable property, as a result of any act or omission of the Defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,

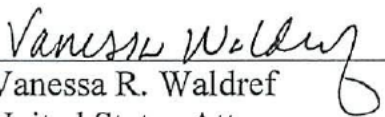
1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p).

3 Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), upon conviction of
4 an offense in violation of 18 U.S.C. § 924(c)(1)(A), as set forth in Count 3 of this
5 Indictment, Defendant, ALLICIANNA LYNNZIE CLARK, shall forfeit to the
6 United States of America, any firearms and ammunition involved or used in the
7 commission of the offense, including, but not limited to:

8 a Glock Model 19, 9mm pistol bearing serial number BEYY793.
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10 DATED this 8 day of October 2024.
11

12 A TRUE BILL
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19 Vanessa R. Waldref
20 United States Attorney

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23 Benjamin D. Seal
24 Assistant United States Attorney
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